

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

In re

Case No. 24-13609

Smokecraft Clarendon, LLC

Chapter 11

Debtor.

DECLARATION OF ANDREW DARNEILLE IN SUPPORT OF FIRST DAY MOTIONS

1. My name is Andrew Darneille, I am over the age of eighteen, and I am competent to testify to the matters set forth herein.

2. I am the manager of Smokecraft Clarendon, LLC (“Smokecraft” or the “Debtor”).

3. I have reviewed the First Day Motion to Pay Pre-Petition Wages of Non-Insider Employees and believe the factual contentions set forth therein to be accurate in nature.

4. Specifically, the payroll of Smokecraft, for the preceding two pay periods, as is set forth in the First Day Motion to Pay Pre-Petition Wages of Non-Insider Employees.

5. Additionally, I have an abiding concern that certain members of the Debtor’s staff would resign if not paid their full wages.

6. I am also concerned that a failure to pay full wages to all employees (excepting myself) would risk fomenting gossip and hampering employee morale which, in turn, could invite demonstrable harm to a consumer-facing business.

7. I have also reviewed the First Day Motion for Leave to Maintain and Administer Gift Cards on an Interim and Final Basis and believe the factual contentions set forth therein to be accurate in nature.

8. Specifically, as noted in the Debtor's schedules, Smokecraft has \$19,045.89 in unredeemed gift cards in circulation and believes utilization of gift cards to be a profitable enterprise for a consumer-facing restaurant.

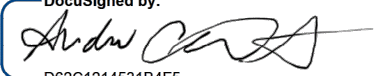
9. I am concerned that a failure to honor existing gift cards would work irreparable harm upon Smokecraft's reputation with the public.

10. I am concerned that Smokecraft would lose valuable opportunities if gift cards ceased to be sold.

11. Further declarant sayeth naught.

I declare under penalty of perjury
that the foregoing is true and correct.

April 29, 2024
Dated

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Andrew Darneille